

William P. Weintraub  
Gregory W. Fox  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
T: 212-813-8800  
E: [wweintraub@goodwinprocter.com](mailto:wweintraub@goodwinprocter.com)  
E: [gfox@goodwinprocter.com](mailto:gfox@goodwinprocter.com)

*Counsel for Hilliard Muñoz Gonzales LLP  
and Thomas J. Henry Injury Attorneys*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**ADAMS PLAINTIFFS’  
STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL**

By and through the undersigned counsel, Hilliard Muñoz Gonzales LLP and Thomas J. Henry Injury Attorneys – counsel to the *Adams* Plaintiffs –submit this Statement of Issues and Designation of Record on Appeal pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure with respect to their appeal from the *Judgment*, dated December 4, 2015 (ECF No. 13563) (the “**Judgment**”) and *Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues*, dated November 9, 2015 (ECF No. 13533) (the “**Decision**”),<sup>1</sup> and respectfully state as follows:

---

<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Decision.

**STATEMENT OF ISSUES**

This appeal by the *Adams* Plaintiffs addresses the following issues:

1. Did the Bankruptcy Court err in Paragraph 24 of the Judgment in holding that “[c]laims that allege that New GM is liable in connection with vehicle owners’ failure to file proofs of claim in the Old GM bankruptcy case are barred and enjoined by the Sale Order, April Decision and June Judgment, and shall not be asserted against New GM”?
2. Did the Bankruptcy Court err in determining that the *Adams* Plaintiffs’ complaint did not state an Independent Claim against New GM?
3. Did the Bankruptcy Court abuse its discretion in barring and enjoining the *Adams* Plaintiffs from pursuing their complaint against New GM without leave to amend?

**DESIGNATED ITEMS**

The *Adams* Plaintiffs hereby designate the following items for inclusion in the record on appeal (i) items 1 through 7 designated in the Appellants' Statement of Issues on Appeal and Designation of Items to Be Included in the Record on Appeal [ECF No. 13576], filed by the Ignition Switch Plaintiffs on December 28, 2015, and (ii) the following items (including any exhibit, annex, or addendum thereto):

<b><u>Description</u></b>	<b><u>Filing Date</u></b>	<b><u>Docket No.</u></b>
1. Decision on Motion to Enforce Sale Order	4/15/2015	13109
2. Judgment	6/1/2015	13177
3. Decision and Order on Bledsoe Plaintiffs' Reargument and Other Post-Judgment Motions	7/22/2015	13313
4. Adams Plaintiffs' No Dismissal Pleading	8/11/2015	13359
5. Response By General Motors LLC to Adams Plaintiffs' No Dismissal Pleading	9/3/2015	13422
6. Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues	11/9/2015	13533
7. Judgment	12/4/2015	13563

Dated: December 30, 2015

Respectfully submitted,

/s/ William P. Weintraub

William P. Weintraub  
Gregory W. Fox  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Tel.: 212.813.8800  
Fax: 212.355.3333  
wweintraub@goodwinprocter.com  
gfox@goodwinprocter.com

*Counsel for Hilliard Muñoz Gonzales LLP  
and Thomas J. Henry Injury Attorneys*